IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI SOUTHEASTERN DIVISION

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UNITED STATES OF AMERICA,)	U. S. DISTRICT COURT EASTERN DISTRICT OF MI CAPE GIRARDEAU
Plaintiff,)	
vs.)	Case No.
LAMAD CROSS,)	Title 18, U.S.C. § 922(o)
Defendant.)	1:22CR00160 SNLJ/ ACI

INDICTMENT

COUNT I

THE GRAND JURY CHARGES THAT:

On or about September 27, 2022, in Cape Girardeau County, Missouri, within the Southeastern Division of the Eastern District of Missouri, Lamad Cross, the defendant herein, knowingly and unlawfully transferred a machine gun, namely a plastic "drop in auto sear", which is a part designed and intended for use in converting a weapon into a machinegun, in violation of Title 18, United States Code, Section 922(0), and punishable under Title 18, United States Code, Section 924(a)(2).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922(g) as set forth above, the defendant(s) shall forfeit to the United States of America any firearm or ammunition involved in or used in said violation(s).

- 2. If any of the property described above, as a result of any act or omission of the defendants:
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

	A TRUE BILL	
SAYLER A. FLEMING	Foreperson	

SAYLER A. FLEMING United States Attorney

Tim J. Willis, # 62428MO Assistant United States Attorney